



January 7, 2008

L. Nelson Roberts  
SCDHEC, Bureau of Air Quality  
2600 Bull Street  
Columbia, SC 29201

***RE: 2008 Ground Level Ozone Non-Attainment Boundary Recommendations***

Dear Mr. Roberts:

This correspondence is in response to SCDHEC Bureau of Air Quality's request for comments on the 2008 Ground Level Ozone Nonattainment Boundary.

The Central Midlands Council of Governments (CMCOG) has long been an active participant with SCDHEC in addressing air quality issues impacting the Central Midlands region (Richland, Lexington, Fairfield, and Newberry Counties). After meeting with representatives from member governments and receiving feedback from the COATS MPO Technical Committee and Transportation Subcommittee, the CMCOG Board on December 13, 2008, recommended that the presumptive nonattainment boundary follow the 2000 Columbia Area Transportation Study (COATS) area, excluding areas in southwest Kershaw County and northwest Calhoun County. A map displaying this area is enclosed with this letter.

The recommended area is most logical for the following reasons:

- 1) The proposed boundary meets a majority of the criteria used by the Environmental Protection Agency in 1997 to determine boundaries along with the added criteria that SCDHEC will use.
- 2) The proposed boundary includes the areas with the highest levels of population density and urbanization in the Central Midlands Region.
- 3) The proposed boundary will cover the largest concentration of emissions sources in the Central Midlands region, including highways, urban areas and industrial facilities.
- 4) By covering a majority of the region's MPO area, the proposed boundary will be consistent with traffic and commuting patterns, and will include suburban and outlying areas where a large number of residents commute on a daily basis.
- 5) The proposed boundary is consistent with current and projected growth patterns, as outlined in Richland and Lexington Counties' comprehensive plans.

- 6) The proposed non-attainment boundary will include jurisdictions that have a proven history of working together to achieve air quality goals and emission reductions in the region, including joint outreach, education, and public participation initiatives.
- 7) The proposed boundary will reduce the number of local jurisdictions that would have to be involved and consulted when coordinating area solutions. Currently, the CMCOG Board serves as the multi-jurisdictional political infrastructure with a long track record of overseeing sound road improvements and supporting the region's air quality initiatives. Expanding this boundary beyond the CMCOG boundary to include other jurisdictions could add further political complexities to the situation. The current Columbia-Newberry Combined Metropolitan Statistical Area would involve a total of four Councils of Governments. Limiting the number of jurisdictions involved should increase the level of efficiency and ease of coordination in collectively reducing region-wide emissions and achieving EPA ozone standards.

CMCOG is always ready to continue to build upon our regional efforts as we strive to attain the 2008 Ground Level Ozone Standard. If you have any questions, please do not hesitate to contact me at 803-376-5390.

Sincerely,

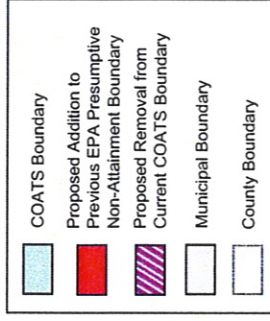
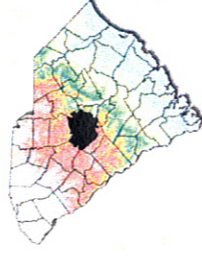
A handwritten signature in dark ink, appearing to read "Norman Whitaker", written over a horizontal line.

Norman Whitaker, Executive Director

pc     Rep. Jimmy C. Bales, CMCOG Chairman  
Reginald Simmons, Transportation Director  
Aaron Bell, Chief Planner

# COATS Proposed EPA Presumptive Non-Attainment Boundary

## COLUMBIA AREA TRANSPORTATION STUDY



Prepared on:  
November 25, 2008

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